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VIA ECF

August 4, 2021

The Honorable Louis Liman  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Emanuele Rigano, et al., v. Piccola Cucina Group, et al.*  
Docket No.: 21 CV 00724 (LJL)

Dear Judge Liman:

We represent the Plaintiffs Beatrice Carolina Bruscoli, Martina Charlton, Lidia Focacci, Emanuele Rigano, and Marlene Sepulvida in the above-referenced wage-and-hour action brought under, *inter alia*, the Fair Labor Standards Act (“FLSA”), against Piccola Cucina Group, Piccola Cucina Group Inc., MGM Thompson LLC, R&G Soho LLC, R&G Spring LLC, M&G 60<sup>th</sup> Street LLC, Philip Guardione, and Alfio Scrivano (“Defendants,” and together with Plaintiffs, as “the Parties”). We submit this letter, after the submission of a joint letter by all parties on July 16, 2021, and following a telephonic conference before the Court on July 27, 2021 with all counsel and all plaintiffs present, to respectfully request that the Court formally approve the Parties’ settlement of Plaintiff’s claims brought pursuant to the FLSA as fair and reasonable in accordance with *Cheeks v. Freeport Pancake House, Inc.*, 796 F.3d 199 (2d Cir. 2015), consistent with the Court’s findings during the July 27 conference. A copy of the Parties’ proposed settlement agreement is attached hereto as **Exhibit A**.

Plaintiffs’ counsel respectfully submits an application attorneys’ fees of \$60,000.00, plus \$400.00 as reimbursement for their out-of-pocket litigation expenses, which are limited to the filing fee, which amounts were found by Your Honor to be fair and reasonable during the July 27 conference, consistent with *Cheeks v. Freeport Pancake House, Inc.* and the prevailing hourly rates for attorneys practicing in this district.

Respectfully submitted,

/s/

Michael P. Mangan

C: All Counsel of Record *via* ECF